

Exhibit 6

1
2 The Honorable Robert J. Bryan
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON

12 STATE OF WASHINGTON,

13 Plaintiff,

14 v.

15 THE GEO GROUP, INC.,

16 Defendant.

17 NO. 3:17-cv-05806-RJB

18 PLAINTIFF STATE OF
19 WASHINGTON'S SECOND
20 REQUESTS FOR PRODUCTION
21 TO DEFENDANT THE GEO
22 GROUP, INC.

23 TO: DEFENDANT THE GEO GROUP, INC.

24 In accordance with Federal Rule 34 you are hereby required to answer, in writing, the
25 following discovery requests including the below Requests for Production separately and fully
26 under oath, within thirty (30) days of their service upon you.

27 **I. TIME AND PLACE OF PRODUCTION**

28 **1.1** The requested written answers to all discovery requests including the below,
29 Requests for Production are to be produced to La Rond Baker, Marsha Chien, and Andrea
30 Brenneke, Assistant Attorneys General, at the Washington State Attorney General's office at
31 800 Fifth Avenue, Suite 2000, Seattle, WA 98104, within thirty (30) days of being served with
32 these Interrogatories or at such other time and place as is agreed to by the parties.

II. COMMUNICATIONS

2.1 All notices, questions, or communications concerning all discovery requests including the below Requests for Production should be directed to La Rond Baker, Assistant Attorney General, 800 Fifth Avenue, Suite 2000, Seattle, Washington 98104-1012, (206) 516-2999 or by email address: LaRondB@atg.wa.gov; Marsha Chien, Assistant Attorney General, 800 Fifth Avenue, Suite 2000, Seattle, Washington 98104-1012, (206) 389-3886 or by email address: MarshaC@atg.wa.gov; and Andrea Brenneke, Assistant Attorney General, 800 Fifth Avenue, Suite 2000, Seattle, Washington 98104-1012, (206) 389-3886 or by email address: AndreaB3@atg.wa.gov.

III. DEFINITIONS

3.1 “Any” and “all” shall be construed as “any and all.”

3.2 “And, “or,” and “and/or” shall be interpreted and construed as broadly as possible to make the discovery request inclusive rather than exclusive, so that information otherwise within the scope of the discovery request is not excluded.

3.3 “Communication” means any conversations, meetings, correspondence, conference, and any other means or manner by which information or opinion is or was communicated to or received from others, whether written, electronic, or oral. The term includes every disclosure, transfer, exchange, or transmission of information, whether oral, written, or electronic, and whether face-to-face, by telecommunications, computer, mail, telecopier, facsimile (fax) machine, or otherwise.

3.4 “Detainee” means any person detained at the Northwest Detention Center.

3.5 “Document” means, without limitation, any “writing,” includes, without limitation, any book, pamphlet, report, memorandum, note, statement, minute, diary, transcript, working paper, telegram, letter, paper, chart, drawing, graph, photograph, publication, tape recording, videotaped or graphic matter, accounting material, records of purchase or sale,

1 contracts, agreements, invoices, and any other existing source of stored information, whether
 2 written, printed, typed, recorded, stored in a computer, or filmed. The term includes originals or
 3 duplicates of or copies of the writings, and non-identical copies bearing or having any
 4 attachments, notes or marks which distinguish them from the originals, and any electronic
 5 records, including, without limitation, electronic mail, spreadsheets, word processing files, and
 6 records saved as .pdf or other electronic files. Electronic mail subject to these discovery requests
 7 includes messages and/or attachments now only available on backup or archive tapes or disks.
 8 Also, if a print-out of an electronic record is a non-identical copy of the electronic version (for
 9 example, because the print-out has a signature, handwritten notation, or other mark or attachment
 10 not included in the computer document), both the electronic version in which the document was
 11 created and the original print-out must be produced. It includes “writings” and “recordings” as
 12 defined in ER 1001(a).

13 **3.6** “ICE” means the Immigration and Customs Enforcement agency of the United
 14 States Department of Homeland Security and all of its officers, principals, agents,
 15 representatives, and any parent, affiliate, sister, subsidiary, predecessor, successor or assignee of
 16 it, and its principals, operating divisions, present or former administrators, employees, servants,
 17 officers, directors, agents, representatives, attorneys, and any other persons or entities acting on
 18 behalf of or under the direction, authorization or control of ICE.

19 **3.7** “Identify” when applied to a natural person or entity means (a) to state the person
 20 or entity's full name, residence or business address and telephone number, and job title or
 21 position, and (b) to give the name, address, and telephone number of the person's employer, if
 22 known to you.

23 **3.8** “Identify” when applied to a business entity means to state the structure of the
 24 business (corporation, partnership, sole proprietorship, etc.), a brief description of the business,
 25 the registered agent for the business, the business address, and the business telephone number.

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1 **3.9** “Identify” when applied to a document means (a) to state the nature of the
2 document (e.g., item of correspondence, note, contract, etc.) in detail sufficient to enable the
3 document to be produced upon motion or request, (b) to give the specific location of the
4 document (e.g., building name, street address, and room number), and (c) to give the name and
5 address of the individual who has physical possession and control of the document.

6 **3.10** “Identify” when applied to a conversation means to separately state as to each
7 communication: a) the date; b) the place at which it occurred or the medium involved; c) the
8 persons involved and their last known addresses known to the answering party and their business
9 affiliations at the time and presently; d) the substance of the communication; and e) the name
10 and present address of any other person who, though not present or involved, possess information
11 concerning the existence or nature of said communication.

12 **3.11** “Northwest Detention Center” (“NWDC”) means the facility located at 1623 J
13 Street, Tacoma, Washington.

14 **3.12** “Person” means any individual, corporation, partnership, association, joint
15 venture, commercial entity, limited liability company, governmental entity, municipality, firm,
16 commission, or agency.

17 **3.13** “Relating”, “Reflect”, “Refer”, or “Pertaining To” as used herein shall mean any
18 information which is relevant in any way to the subject matter, including without limitation to
19 the foregoing, all information which contain, record, reflect, summarize, evaluate, comment
20 upon, transmit or discuss the subject matter of any request, as well as drafts, work papers or other
21 preparation material, exhibits shown or circulated at any meeting, and the text or notes of any
22 oral or written presentation or conversation.

23 **3.14** “Relevant time period” means from November 1, 2005, to the present.

24 **3.15** To “state the basis” for an allegation, denial, claim, contention, or assertion means
25 to: (a) state all facts and circumstances upon which it is based, in whole or in part, or which relate
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1 or pertain to it, including any pertinent statute or regulation and every theory of law upon which
 2 it is based; (b) identify all documents supporting, refuting, describing, commenting upon,
 3 pertaining to, or otherwise relating to it; (c) identify all persons having knowledge of it, including
 4 the circumstances under which they came to have such knowledge; and (d) identify all persons
 5 who provided the information upon which Your response is based.

6 **3.16** “You” and “Your” and “GEO” refers to The GEO Group, Inc. and any parent,
 7 affiliate, sister, subsidiary, predecessor, successor or assignee of it, and its principals, operating
 8 divisions, present or former owners, employees, servants, officers, directors, agents,
 9 representatives, attorneys, accountants, independent contractors, distributors, and any other
 10 persons or entities acting on behalf of or under the direction, authorization or control of The
 11 GEO Group, Inc., including any foreign or overseas affiliates.

12 **IV. INSTRUCTIONS**

13 **4.1** These discovery requests request production of all described documents and
 14 information in Your possession, custody or control without regard to the person or persons by
 15 whom or for whom the documents were prepared (e.g., Your employees, distributors,
 16 representatives, competitors, or others).

17 **4.2** Each discovery request including the below Requests for Production shall be
 18 accorded a separate answer. For the convenience of the parties and the Court, please quote each
 19 Request for Production in full immediately preceding the answer thereto.

20 **4.3** This request includes documents in possession of Your employees, agents,
 21 representatives, and attorneys, unless privileged. If any document or information is withheld
 22 under claim of privilege, identify the document and state the basis for the privilege, and provide
 23 a detailed privilege log that contains at least the following information for each document or
 24 information that You have withheld:

25 a. The name of each author, writer, sender, creator, or initiator of such

- document, and each such person's title and his or her employer or firm;
- b. The name of all recipients, addressees, or parties for whom such document was intended or to whom the document was sent;
- c. The date of such document, or an estimate thereof if no date appears on the document;
- d. The Request for Production to which the allegedly privileged document corresponds.
- e. The general subject matter of the document; and
- f. The claimed grounds for withholding the document, including, but not limited to, the nature of any claimed privilege and grounds in support thereof, stated in a manner that does not reveal privileged information but that provides information sufficiently detailed so as to enable the State to assess the applicability of the privileged claimed.

4.4 Pursuant to Federal Rule 26(e), these discovery requests including the below Requests for Production impose a continuing duty to supplement Your responses in the event additional documents and information comes into Your knowledge, possession, custody or control after Your initial production of responses to the requests.

4.5 Your responses to these discovery requests including the below Requests for Production are to be inclusive rather than exclusive. If the language of any of these discovery requests including the below Requests for Production is phrased in the singular, the Request includes the plural, and if the language of a Request is phrased in the plural, the Request includes the singular.

4.6 If You cannot answer a Request completely, You must answer to the extent possible and identify with specificity the part(s) which You cannot answer completely.

4.7 If You object to responding to part of a Request, You are required to furnish the

information that is outside the scope of Your partial objection.

4.8 In each instance in which a document is produced in response to a discovery request, produce the current edition, along with all earlier editions or predecessor documents serving the same function, even though the title of earlier documents may differ from current versions.

4.9 The following procedures shall apply to the production of documents and information in response to these discovery requests including the below Requests for Production:

- a. The recipient of these Requests shall label each responsive document or answer (i.e., Response to Request No. 1, Response to Request No. 2, and so forth), group all documents responsive to a particular request together, and place a label on each group of documents which identifies the corresponding discovery request;
- b. All attachments to responsive documents or information shall be produced with, and attached to, the responsive documents (or digitally in corresponding order);
- c. Each responsive document or information shall be produced in its entirety and no portion of any document or information shall be edited, cut, masked, redacted or otherwise altered, unless for applicable privilege which shall be logged according to the procedures set forth above;
- d. The recipient of these Requests for Admision shall provide a key to all abbreviations used in the documents or information and shall attach the key to the corresponding documents or information.

4.10 Documents or information that may be responsive to more than one (1) numbered request in these discovery requests need not be submitted more than once. However, for each

1 such document or information, the recipient of these Requests for Production shall identify all
2 of the numbered requests to which the Document or information is responsive.

3 **4.11** You shall consecutively number each page of all documents or information
4 produced with Your response and indicate the total number of pages produced with Your
5 response. This page numbering must be separate from and must not alter any original page
6 numbering on the responsive documents or information.

7 **4.12** Your responses to these discovery requests should include all relevant
8 electronically stored information in Your possession, custody, or control. Washington considers
9 electronically stored information to be an irreplaceable source of evidence in this matter.
10 Accordingly, the State of Washington insists that you implement appropriate safeguards against
11 the destruction of evidence until the final resolution of this issue.

12 **4.13** Production of electronically stored information and other documents in electronic
13 format shall conform to the standards set forth in Exhibit A, which is attached to this document.

14 **4.14** If You are unable to fully answer any discovery request including any of the
15 below Requests for Production, supply all of whatever information is actually available.
16 Designate such incomplete information as incomplete and accompany the information with an
17 explanation that includes the reasons for the incomplete answer; a description of any and all of
18 Your efforts to obtain the information; and the source from which the Office of the Attorney
19 General may obtain information to complete Your response. If books, records, or other sources
20 that provide accurate answers are not available, provide Your best estimates and describe how
21 You derived the estimates, including the sources or bases of such estimates. Designate estimated
22 data as such by marking it with the "est." notation. If there is no reasonable way for you to make
23 an estimate, provide an explanation.

24 **4.15** If particular documents responsive to these Requests for Production no longer
25 exist for reasons other than the ordinary course of business but you have reason to believe they
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1 have been in existence, describe the documents; state the circumstances under which such
2 documents were lost or destroyed, and identify persons having knowledge of the content of the
3 documents.

4 **V. REQUESTS FOR PRODUCTION**

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6 **REQUEST FOR PRODUCTION NO. 18:** Please produce all documents that are referenced
7 in, support, or that form the basis of Your response to Interrogatory No. 7.

8 **RESPONSE:**

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11 **REQUEST FOR PRODUCTION NO. 19:** Please produce all documents that are referenced
12 in, support, or that form the basis of Your response to Interrogatory No. 8.

13 **RESPONSE:**

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16 **REQUEST FOR PRODUCTION NO. 20:** Please produce all documents that are referenced
17 in, support, or that form the basis of Your response to Interrogatory No. 9.

18 **RESPONSE:**

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21 **REQUEST FOR PRODUCTION NO. 21:** Please produce all documents that are referenced
22 in, support, or that form the basis of Your response to Interrogatory No. 10.

23 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 22:** Please produce all documents that are referenced
2 in, support, or that form the basis of Your response to Interrogatory No. 11.

3 **RESPONSE:**

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6 **REQUEST FOR PRODUCTION NO. 23:** Please produce all documents that are referenced
7 in, support, or that form the basis of Your response to Interrogatory No. 12.

8 **RESPONSE:**

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11 **REQUEST FOR PRODUCTION NO. 24:** Please produce all documents that are referenced
12 in, support, or that form the basis of Your response to Interrogatory No. 13.

13 **RESPONSE:**

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16 **REQUEST FOR PRODUCTION NO. 25:** Please produce all documents that are referenced
17 in, support, or that form the basis of Your response to Interrogatory No. 14.

18 **RESPONSE:**

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21 **REQUEST FOR PRODUCTION NO. 26:** Please produce all documents that are referenced
22 in, support, or that form the basis of Your response to Interrogatory No. 15.

23 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 27:** Please produce all documents that are referenced
2 in, support, or that form the basis of Your response to Interrogatory No. 16.

3 **RESPONSE:**

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6 **REQUEST FOR PRODUCTION NO. 28:** Please produce all documents that are referenced
7 in, support, or that form the basis of Your response to Interrogatory No. 17.

8 **RESPONSE:**

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11 **REQUEST FOR PRODUCTION NO. 29:** Please produce all documents that are referenced
12 in, support, or that form the basis of Your response to Interrogatory No. 18.

13 **RESPONSE:**

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16 **REQUEST FOR PRODUCTION NO. 30:** For each of the years 2005 to the present, please
17 produce all documents, reports, and databases that contain aggregated data or information about
18 the number of hours worked by detainee workers in NWDC's VWP.

19 **RESPONSE:**

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22 **REQUEST FOR PRODUCTION NO. 31:** Please produce all schedules or other documents
23 that set forth the number of hours detainee workers work to complete each task/assignment/
24 position in the VWP.

25 **RESPONSE:**

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1 **REQUEST FOR PRODUCTION NO. 32:** For each of the years 2005 to the present, please
2 produce all documents, reports, and databases that contain aggregated data or information about
3 the hours of detainee work broken down by location of work/tasks/assignments/positions
4 performed by detainee workers in NWDC's VWP.

5 **RESPONSE:**

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9 **REQUEST FOR PRODUCTION NO. 33:** Please produce all training materials and
10 documents for training provided to detainee workers for each and every VWP
11 task/assignment/position.

12 **RESPONSE:**

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16 **REQUEST FOR PRODUCTION NO. 34:** Please produce all training materials for GEO
17 employees regarding the VWP program.

18 **RESPONSE:**

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22 **REQUEST FOR PRODUCTION NO. 35:** For the relevant years, please produce all NWDC
Housekeeping Plans.

23 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 36:** For each of the years 2005 to the present, please
2 produce all documents, reports, and databases that contain aggregated data or information about
3 detainee worker compensation for participation in NWDC's VWP.

4 **RESPONSE:**

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7 **REQUEST FOR PRODUCTION NO. 37:** For the relevant time period, please produce all
8 invoices and supporting documents submitted to ICE for payments related to the VWP.

9 **RESPONSE:**

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12 **REQUEST FOR PRODUCTION NO. 38:** For each of the years 2005 to the present, please
13 produce all GEO's financial statements, Profit and Loss statements, budget, and budget to actual
14 analysis on a quarterly or annual basis for each of the years during the relevant time period.

15 **RESPONSE:**

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18 **REQUEST FOR PRODUCTION NO. 39:** To the extent not previously produced, please
19 produce GEO's U.S. Corrections & Detention Division financial statements, Profit and Loss
20 statements, budget, and budget to actual analysis on a quarterly or annual basis for each of the
21 years during the relevant time period.

22 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 40:** To the extent not previously produced, please
2 produce the NWDC's financial statements, Profit and Loss statements, budget, and budget to
3 actual analysis on a quarterly or annual basis from 2005 to present, including all documents that
4 set forth the detailed operating costs of the facility, Voluntary Work Program costs, labor costs,
5 and payroll expenses as well as all details of revenue, contract payments and reimbursements.

6 **RESPONSE:**

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9 **REQUEST FOR PRODUCTION NO. 41:** To the extent not previously produced, please
10 produce all documents that contain financial performance analysis, financial models, financial
11 evaluations, analysis of profits earned, or other assessments of the performance of the NWDC
12 contract(s) with ICE.

13 **RESPONSE:**

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16 **REQUEST FOR PRODUCTION NO. 42:** To the extent not previously produced, please
17 produce all documents related to the profit or loss of the NWDC's Voluntary Work Program,
18 including budget, and budget to actual analysis on a quarterly or annual basis from 2005 to the
19 present, and all documents that set forth the detailed operating costs of the Voluntary Work
20 Program, as well as revenues, payments and reimbursements received.

21 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 43:** To the extent not previously produced, please
2 produce all documents that contain financial analysis, financial models, analysis of profits
3 earned, valuation of the work performed, or other assessments of the Voluntary Work Program
4 at the NWDC from 2004 to present.

5 **RESPONSE:**

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8 **REQUEST FOR PRODUCTION NO. 44:** To the extent not previously produced, please
9 produce all documents that contain financial analysis, financial models, analysis of profits
10 earned, valuation of the work performed, or other assessments of the Voluntary Work Program
11 within the GEO Group from 2005 to the present.

12 **RESPONSE:**

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15 **REQUEST FOR PRODUCTION NO. 45:** For each of the year from 2005 to the present,
16 please produce a representative commissary price list used by detainees during that year to order
17 items from the commissary.

18 **RESPONSE:**

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21 **REQUEST FOR PRODUCTION NO. 46:** Please produce all documents that set forth the
22 terms and conditions of the NWDC detainee telephone/communications system, including,
23 without limitation, the contract(s) with vendors.

24 **RESPONSE:**

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1 **REQUEST FOR PRODUCTION NO. 47:** For each of the year from 2005 to the present,
2 please produce a representative telephone/communications price list or other documents that set
3 forth the cost of telephone calls and video calls made by detainees.

4 **RESPONSE:**

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7 **REQUEST FOR PRODUCTION NO. 48:** To the extent not previously produced, please
8 produce the contract(s) originally entered into by the GEO Group's predecessor Correctional
9 Services Corporation.

10 **RESPONSE:**

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13 **REQUEST FOR PRODUCTION NO. 49:** Please produce the ICE solicitation(s) for all
14 ICE/GEO Group Contracts related to the NWDC from 2005 to present.

15 **RESPONSE:**

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19 **REQUEST FOR PRODUCTION NO. 50:** To the extent not previously produced, please
20 produce the GEO Group's offer(s) and bid(s), and all supporting documents and submissions in
21 support of those offer(s) and bid(s), submitted in response to ICE solicitation(s), or in
22 negotiations related to amendment(s) and renewal(s), of contracts related to the NWDC at any
23 time from 2005 to the present.

24 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 51:** Please produce all documents containing financial
2 performance analyses, financial models, or other financial evaluations prepared in connection
3 with or for the purpose of GEO Group's offer(s) and bid(s), and negotiations related to
4 amendment(s) and renewal(s), of contracts related to the NWDC from 2005 - present.

5 **RESPONSE:**

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9 **REQUEST FOR PRODUCTION NO. 52:** To the extent not previously produced, please
10 produce any per diem rate calculations and models related to GEO Group's NWDC Contract(s)
11 from 2005 to present, including, but not limited to, the following factors: "Voluntary Work
12 Program" costs and expenses; labor costs and payroll expenses (excluding Voluntary Work
13 Program); expected and guaranteed occupancy; all other costs of providing services (including
14 food, medical, building operations, etc.); desired margins.

15 **RESPONSE:**

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19 **REQUEST FOR PRODUCTION NO. 53:** To the extent not previously produced, please
20 produce any calculations concerning overhead and other costs allocated to the NWDC Contracts
21 in evaluating profitability and the per diem rates as well as the methodology used to allocate
22 such costs, including any changes in methodology.

23 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 54:** To the extent not previously produced, please
2 produce all documents that contain any analyses of the NWDC Contract costs, and categorization
3 of those costs as variable or fixed, during the relevant period and any changes to allocation of
4 costs inbetween categories.

5 **RESPONSE:**

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8 **REQUEST FOR PRODUCTION NO. 55:** To the extent not previously produced, please
9 produce any documents or information related to assumptions made in determining the
10 contractually negotiated per diem rate(s) and calculations for the NWDC Contracts.

11 **RESPONSE:**

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14 **REQUEST FOR PRODUCTION NO. 56:** Please produce all audit reports and findings in
15 connection with all internal audits of the NWDC's VWP during the relevant period.

16 **RESPONSE:**

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19 **REQUEST FOR PRODUCTION NO. 57:** Please produce all audit reports and findings in
20 connection with all governmental agency audits of the NWDC's VWP during the relevant
21 period.

22 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 58:** Please produce all detainee worker kites or
2 complaints and all documents, responses, and resolutions to those kites or complaints that relate,
3 in any way, to compensation or failure to pay compensation for work done in the VWP;

4 **RESPONSE:**

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7 **REQUEST FOR PRODUCTION NO. 59:** Please produce all detainee worker kites or
8 complaints regarding the VWP and all documents, responses, and resolutions to those kites or
9 complaints that relate, in any way, to working hours, working conditions, treatment by guards at
10 work, hiring, job assignments, supervision, or termination.

11 **RESPONSE:**

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14 **REQUEST FOR PRODUCTION NO. 60:** Please produce documents that relate, in any way,
15 to staff recruitment from the local community and the NWDC contribution to the local economy
16 through salaries and purchase of goods and services.

17 **RESPONSE:**

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20 DATED this 12th day of June, 2018.

21 ROBERT W. FERGUSON
22 Attorney General

23
24

/s La Rond Baker
25 LA ROND BAKER, WSBA No. 43610
26 MARSHA CHIEN, WSBA No. 47020
ANDREA BRENNEKE, WSBA No. 22027

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DECLARATION OF SERVICE

I certify that I served a copy of this document on all parties or their counsel of record on the date below as follows:

Electronic Service (by agreement of counsel) to:

Joan Mell
III Branches Law, PLLC
1019 Regents Blvd., Ste. 204
Fircrest, WA 98466
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I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 12th day of June, 2018, at Seattle, Washington.

s/ *La Rond Baker*
LA ROND BAKER